

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



**FILED**  
1-30-15  
04:59 PM

Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Refinements, and Establish Annual Local and Flexible Procurement Obligations for the 2016 and 2017 Compliance Years.

Rulemaking 14-10-010  
(Filed October 16, 2014)

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this date served a copy of **COMMENTS OF THE OFFICE OF RATEPAYER ADVOCATES ON ENERGY DIVISION PROPOSALS** to all known parties by either United States mail or electronic mail, to each party named on the official service list in **R.14-10-010**.

I also hand-delivered a hard copy to the assigned Administrative Law Judge's mail slot.

Executed on **January 30, 2015**, at San Francisco, California.

/s/ TERRY L. GRAY  
TERRY L. GRAY



**CALIFORNIA PUBLIC UTILITIES COMMISSION**  
**Service Lists**

**Proceeding: R1410010 - CPUC - OIR TO OVERSE**

**Filer: CPUC**

**List Name: LIST**

**Last changed: January 28, 2015**

**Parties**

JEREMY WAEN  
REGULATORY ANALYST  
MARIN CLEAN ENERGY  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
FOR: MARIN CLEAN ENERGY

MATT MILEY  
CPUC  
LEGAL DIVISION  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
FOR: ORA

SEAN P. BEATTY  
REGIONAL GENERAL COUNSEL - WEST  
STRATEGY  
NRG ENERGY, INC,  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
FOR: NRG ENERGY INC.

FRANK LACEY  
VP - REGULATORY & MKT  
  
COMVERGE, INC.  
415 MCFARLAN ROAD, SUITE 201  
KENNETT SQUARE, PA 19348  
FOR: COMVERGE, INC.

ERIC C. APFELBACH  
PRESIDENT AND CEO  
ZBB ENERGY CORPORATION  
BOX 800  
N93 W14475 WHITTAKER WAY  
MENOMONEE FALLS, WI 53051  
EDISON COMPANY  
FOR: ZBB ENERGY CORPORATION

ROBERT F. LEMOINE  
SOUTHERN CALIFORNIA EDISON  
2244 WALNUT GROVE AVE./ PO  
  
ROSEMEAD, CA 91770  
FOR: SOUTHERN CALIFORNIA

AIMEE M. SMITH  
ATTORNEY  
SAN DIEGO GAS & ELECTRIC COMPANY  
101 ASH STREET, HQ-12  
SAN DIEGO, CA 92101  
FOR: SAN DIEGO GAS & ELECTRIC COMPANY  
STORAGE ALLIANCE

DONALD C. LIDDELL  
ATTORNEY  
DOUGLAS & LIDDELL  
2928 2ND AVE.  
SAN DIEGO, CA 92103  
FOR: CALIFORNIA ENERGY

MONA TIERNEY-LLOYD

SUE MARA

SR. DIR., WESTERN REGULATORY AFFAIRS  
ENERNOC, INC.  
PO BOX 378  
CAYUCOS, CA 93430  
FOR: ENERNOC, INC.  
ENERGY MARKETS

CONSULTANT  
RTO ADVISORS, LLC  
164 SPRINGDALE WAY  
REDWOOD CITY, CA 94062  
FOR: ALLIANCE FOR RETAIL

(AREM)

CRAIG R. HORNE, PH.D  
CHIEF STRATEGY OFFICER AND CO-FOUNDER  
ENERVAULT CORPORATION  
COMPANY  
1244 REAMWOOD AVENUE  
BOX 7442  
SUNNYVALE, CA 94089  
FOR: ENERVAULT CORPORATION  
COMPANY

MARK R. HUFFMAN  
ATTORNEY AT LAW  
PACIFIC GAS AND ELECTRIC  
77 BEALE STREET, B30A / PO  
SAN FRANCISCO, CA 94105  
FOR: PACIFIC GAS AND ELECTRIC

MATTHEW VESPA  
SR. ATTORNEY  
SIERRA CLUB  
1850  
85 SECOND ST,, 2ND FL  
SAN FRANCISCO, CA 94105  
CONSUMERS  
FOR: SIERRA CLUB

NORA SHERIFF  
ALCANTAR & KAHL  
33 NEW MONTGOMERY ST., STE.  
SAN FRANCISCO, CA 94105  
FOR: CALIFORNIA LARGE ENERGY  
ASSOCIATION

BRIAN T. CRAGG  
ATTORNEY  
GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111  
FOR: INDEPENDENT ENERGY PRODUCERS  
CALPINE POWER  
ASSOCIATION

JEFFREY P. GRAY  
ATTORNEY  
DAVIS WRIGHT TREMAINE, LLP  
505 MONTGOMERY ST., STE 800  
SAN FRANCISCO, CA 94111-6533  
FOR: CALPINE CORPORATION;  
AMERICA-CA, LLC

SARA STECK MYERS  
ATTORNEY AT LAW  
LAW OFFICES OF SARA STECK MYERS  
122 28TH AVE.  
SAN FRANCISCO, CA 94121  
EFFICIENCY AND  
FOR: JOINT DR PARTIES: ENERNOC, INC.,  
(CEERT)  
JOHNSON CONTROLS, INC., COMVERGE, INC.

SARA STECK MYERS  
ATTORNEY AT LAW  
122 - 28TH AVENUE  
SAN FRANCISCO, CA 94121  
FOR: CENTER FOR ENERGY  
RENEWABLE TECHNOLOGIES

TIM HENNESSY  
PRESIDENT AND COO  
IMERGY POWER SYSTEMS, INC.  
48611 WARM SPRINGS BLVD.  
FREMONT, CA 94539  
FOR: IMERGY POWER SYSTEMS, INC.

GREGG MORRIS  
GREEN POWER INSTITUTE  
2039 SHATTUCK AVE., SUTE. 402  
BERKELEY, CA 94704  
FOR: GREEN POWER INSTITTUE

JENNIFER A. CHAMBERLIN  
DIR. REG AFFAIRS - INT. DEMAND RESOURCES  
JOHNSON CONTROLS, INC.  
OPERATOR CORP.  
901 CAMPISI WAY, SUITE 260  
CAMPBELL, CA 95008-2348  
FOR: JOHNSON CONTROLS, INC.  
SYSTEM

BETH ANN BURNS  
SR. COUNSEL  
CAL. INDEPENDENT SYSTEM  
  
250 OUTCROPPING WAY  
FOLSOM, CA 95630  
FOR: CALIFORNIA INDEPENDENT  
  
OPERATOR CORPORATION (CAISO)

DONALD E. BROOKHYSER  
ATTORNEY AT LAW  
COUNSEL  
ALCANTAR & KAHL  
121 S.W. SALMON ST., STE. 1100  
STE. A  
PORTLAND, OR 97204  
FOR: COGENERATION ASSOCIATION OF  
LLC  
CALIFORNIA

RUSSELL WEED  
VP, BUS. DEVELOPMENT & GEN.  
  
UNIENERGY TECHNOLOGIES, LLC  
4333 HARBOUR POINTE BLVD, SW,  
  
MUKILTEO, WA 98275  
FOR: UNIENERGY TECHNOLOGIES,

### **Information Only**

BARBARA BARKOVICH  
BARKOVICH & YAP  
COMPANY  
EMAIL ONLY  
EMAIL ONLY, CA 00000

CASE COORDINATION  
PACIFIC GAS AND ELECTRIC  
  
EMAIL ONLY  
EMAIL ONLY, CA 00000

CHRIS SMITH  
PACIFIC GAS AND ELECTRIC COMPANY  
EMAIL ONLY  
SYSTEMS  
EMAIL ONLY, CA 00000

DAVID MILLER  
DIR - BUSINESS DEVELOPMENT  
GREENSMITH ENERGY MANAGEMENT  
  
EMAIL ONLY  
EMAIL ONLY, CA 00000

DR. ERIC C. WOYCHIK  
EXECUTIVE CONSULTANT & PRINCIPAL  
STRATEGY INTEGRATION LLC  
EMAIL ONLY  
EMAIL ONLY, CA 00000

ENRIQUE GALLARDO  
POLICY DIRECTOR  
CLEAN COALITION  
EMAIL ONLY  
EMAIL ONLY, CA 00000

JOHN W. LESLIE, ESQ  
MCKENNA LONG & ALDRIDGE LLP  
AGENCIES  
EMAIL ONLY  
ELECTRIC DEPT.  
EMAIL ONLY, CA 00000

JOYCE KINNEAR  
DIVISION MANAGER, JOINT POWER  
  
CITY OF SANTA CLARA -  
  
EMAIL ONLY  
EMAIL ONLY, CA 00000

KEVIN WOODRUFF  
WOODRUFF EXPERT SERVICES  
(U.S.). LP  
1100 K STREET, STE. 204  
SACRAMENTO, CA 00000

MARCIE A. MILNER  
SHELL ENERGY NORTH AMERICA  
  
EMAIL ONLY  
EMAIL ONLY, CA 00000

MARIA STAMAS  
LEGAL FELLOW, ENERGY PROGRAM  
ANALYST  
NATURAL RESOURCES DEFENSE COUNCIL  
EMAIL ONLY  
EMAIL ONLY, CA 00000

MATTHEW BARMACK  
DIRECTOR, MARKET & REGULATORY  
  
CALPINE CORPORATION  
EMAIL ONLY  
EMAIL ONLY, CA 00000

MCE REGULATORY  
MARIN CLEAN ENERGY  
EMAIL ONLY  
EMAIL ONLY, CA 00000

PATRICK FERGUSON  
DAVIS WRIGHT TREMAINE, LLP  
EMAIL ONLY  
EMAIL ONLY, CA 00000

RACHEL GOLD  
POLICY DIRECTOR  
TRANSMISSION/INTERCONNECTION  
LARGE-SCALE SOLAR ASSOCIATION  
EMAIL ONLY  
EMAIL ONLY, CA 00000

SANDEEP ARORA  
ASST. V.P.-  
  
LS POWER DEVELOPMENT, LLC  
EMAIL ONLY  
EMAIL ONLY, CA 00000

UDI HELMAN  
HELMAN ANALYTICS  
EMAIL ONLY  
EMAIL ONLY, CA 00000

VIDHYA PRABHAKARAN  
ATTORNEY  
DAVIS WRIGHT & TREMAINE, LLP  
EMAIL ONLY  
EMAIL ONLY, CA 00000

DAVIS WRIGHT TREMAINE LLP  
EMAIL ONLY  
EMAIL ONLY, CA 00000

MRW & ASSOCIATES, LLC  
EMAIL ONLY  
EMAIL ONLY, CA 00000

KAREN TERRANOVA  
ALCANTAR & KAHL  
EMAIL ONLY  
EMAIL ONLY, CA 00000-0000  
293

PETER DOTSON-WESTPHALEN  
MARKET DEVELOPMENT DIRECTOR  
CPOWER  
201 EDGEWATER DRIVE, STGE.  
  
WAKEFIELD, MA 01880

ERIC OSBORN  
CALPINE POWER AMERICA-CA, LLC  
717 TEXAS AVENUE, STE 100  
HOUSTON, TX 77002

CALPINE POWER AMERICA-CA, LLC  
717 TEXAS AVENUE, SUITE 100  
HOUSTON, TX 77002

GREGORY S. KLATT  
DOUGLASS & LIDDELL

P DOUGLASS  
ATTORNEY

21700 OXNARD ST., STE. 1030  
WOODLAND HILLS, CA 91367

ENERGY MARKETS

TRADING FORUM

CASE ADMINISTRATION  
LAW DEPARTMENT  
SOUTHERN CALIFORNIA EDISON COMPANY  
COMPANY  
2244 WALNUT GROVE AVENUE  
GROVE AVE.  
ROSEMEAD, CA 91770

DEAN A. KINPORTS  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK COURT CP32D  
CP21D  
SAN DIEGO, CA 92123

DIANA L. LEE  
CALIF PUBLIC UTILITIES COMMISSION  
COMMISSION  
LEGAL DIVISION  
BRANCH  
ROOM 4107  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

ZITA KLINE  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY PLANNING & POLICY BRANCH  
ROOM 4102  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

CHARLES R. MIDDLEKAUFF  
PACIFIC GAS AND ELECTRIC COMPANY  
LAW DEPT.  
ROSATI  
77 BEALE STREET, B30A / PO BOX 7442  
TOWER, STE 3300  
SAN FRANCISCO, CA 94105

KATIE JORRIE  
DAVIS WRIGHT TREMAINE, LLP  
505 MONTGOMERY STREET, SUITE 800  
SAN FRANCISCO, CA 94111

DOUGLASS & LIDDELL  
21700 OXNARD ST., STE. 1030  
WOODLAND HILLS, CA 91367  
FOR: ALLIANCE FOR RETAIL

(AREM) / WESTERN POWER

(WPTF)

WILLIAM V. WALSH  
DIRECTING & MANAGING ATTORNEY  
SOUTHERN CALIFORNIA EDISON

PO BOX 800 / 2244 WALNUT  
ROSEMEAD, CA 91770

NUO TANG  
SAN DIEGO GAS & ELECTRIC  
8315 CENTURY PARK COURT,  
SAN DIEGO, CA 92123

PETER SPENCER  
CALIF PUBLIC UTILITIES  
ELECTRICITY PLANNING & POLICY  
ROOM 4104  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

THOMAS LONG  
LEGAL DIR.  
THE UTILITY REFORM NETWORK  
785 MARKET ST., STE. 1400  
SAN FRANCISCO, CA 94103

SHERIDAN J. PAUKER, ESQ.  
REGULATORY COUNSEL  
WILSON SONSINI GOODRICH &  
ONE MARKET PLAZA, SPEAR  
SAN FRANCISCO, CA 94105

SARAH KEANE  
MORGAN LEWIS & BOCKIUS, LLP  
3 EMBARCADERO CENTER  
SAN FRANCISCO, CA 94111

WILLIAM KISSINGER  
BINGHAM MCCUTCHEN LLP  
THREE EMBARCADERO CENTER, 28TH FL.  
28TH FLOOR  
SAN FRANCISCO, CA 94111

MONICA SCHWEBS  
BINGHAM MCCUTCHEN LLP  
THREE EMBARCADERO CENTER,  
  
SAN FRANCISCO, CA 94111-4067

CALIFORNIA ENERGY MARKETS  
425 DIVISADERO ST. STE 303  
MYERS  
SAN FRANCISCO, CA 94117-2242

MEGAN MACNEIL MYERS  
LAW OFFICES OF SARA STECK  
  
122 - 28TH AVENUE  
SAN FRANCISCO, CA 94121

KERRY HATTEVIK  
REG. DIR.- WEST GOVERNMENTAL AFFAIRS  
NEXT ERA ENERGY RESOURCES LLC  
829 ARLINGTON BLVD.  
EL CERRITO, CA 94530

LAURA WISLAND  
SENIOR ENERGY ANALYST  
UNION OF CONCERNED SCIENTISTS  
500 12TH ST., STE. 340  
OAKLAND, CA 94607

NANCY RADER  
EXECUTIVE DIRECTOR  
CALIFORNIA WIND ENERGY ASSOCIATION  
2560 NINTH STREET, STE. 213A  
BERKELEY, CA 94710

PHILLIP MULLER  
PRESIDENT  
SCD ENERGY SOLUTIONS  
436 NOVA ALBION WAY  
SAN RAFAEL, CA 94903

JAMES H. CALDWELL, JR  
1650 E. NAPA STREET  
SONOMA, CA 95476  
100

PRAMOD P. KULKARNI  
CUSTOMIZED ENERGY SOLUTIONS  
101 PARKSHORE DRIVE, SUITE  
  
FOLSOM, CA 95630

BRIAN THEAKER  
NRG ENERGY  
3161 KEN DEREK LANE  
INC  
PLACERVILLE, CA 95667

DOUGLAS DAVIE  
V.P.  
WELLHEAD ELECTRIC COMPANY,  
  
650 BERECUT DRIVE, SUITE C  
SACRAMENTO, CA 95811

JUSTIN WYNNE  
ATTORNEY  
BRAUN BLAISING MCLAUGHLIN & SMITH, P.C.  
915 L STREET, SUITE 1270  
SACRAMENTO, CA 95814

MIGUEL CERRUTTI  
CALIFORNIA ENERGY COMMISSION  
1516 NINTH STREET  
SACRAMENTO, CA 95814

SCOTT BLAISING  
ATTORNEY  
L.L.P.  
BRAUN BLAISING MCLAUGHLIN & SMITH, P.C.  
400

SAMANTHA G. POTTENGER  
ELLISON, SCHNEIDER AND HARRIS  
  
2600 CAPITOL AVENUE, SUITE

915 L STREET, STE. 1270  
SACRAMENTO, CA 95814

SACRAMENTO, CA 95816

ANDREW B. BROWN  
ATTORNEY AT LAW  
ELLISON SCHNEIDER & HARRIS LLP  
SUITE 205  
2600 CAPITOL AVENUE, SUITE 400  
SACRAMENTO, CA 95816-5905

ANN L. TROWBRIDGE  
DAY CARTER & MURPHY LLP  
3620 AMERICAN RIVER DRIVE,  
SACRAMENTO, CA 95864

### **State Service**

ERIC DUPRE  
CPUC  
EMAIL ONLY  
EMAIL ONLY, CA 00000

JAIME ROSE GANNON  
CPUC - ENERGY  
EMAIL ONLY  
EMAIL ONLY, CA 00000

LILY CHOW  
REGULATORY ANALYST  
COMMISSION  
CALIFORNIA PUBLIC UTILITIES COMMISSION  
LAW JUDGES  
EMAIL ONLY  
EMAIL ONLY, CA 00000

DAVID M. GAMSON  
CALIF PUBLIC UTILITIES  
DIVISION OF ADMINISTRATIVE  
ROOM 5019  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

DAVID MILLER  
CALIF PUBLIC UTILITIES COMMISSION  
COMMISSION  
INFRASTRUCTURE PLANNING AND PERMITTING B  
OVERSIGHT BRANC  
AREA  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

DONALD J. BROOKS  
CALIF PUBLIC UTILITIES  
PROCUREMENT STRATEGY AND  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

MICHELE KITO  
CALIF PUBLIC UTILITIES COMMISSION  
COMMISSION  
PROCUREMENT STRATEGY AND OVERSIGHT BRANC  
GENERATION, AN  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

RACHEL MCMAHON  
CALIF PUBLIC UTILITIES  
DEMAND RESPONSE, CUSTOMER  
AREA  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

CARY GARCIA  
CALIFORNIA ENERGY COMMISSION  
1516 NINTH STREET, MS-22  
SACRAMENTO, CA 95814